

Policy Title	Federal Financial Aid Verification & Conflicting Data
Policy Number:	ADM 4.03
Department:	SOMI
Functional Area:	Finance
Contributing Department	
Approved by:	RHEI Leadership Team
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Manual	To be entered by Compliance360 System administrators or N/A if not in C360
Section	ADM 4

I. Mission, Vision and Values

This policy reflects our commitment to human dignity, integrity, compassion, stewardship, and service by guiding decisions and actions that uphold respect for all individuals and promote excellence in our work.

This policy aligns with our mission of extending the compassionate ministry of Jesus by improving the health and well-being of our communities and providing good help to those in need, especially the poor, dying, and underserved by ensuring that our practices support ethical, effective, and accountable service across all areas of the organization.

II. Policy

It is the policy of Bon Secours St. Mary's Hospital School of Medical Imaging (SOMI) that participates in programs regulated by Title IV – Higher Education Act of 1965, as amended (Title IV Regulations), to verify the accuracy of information provided when determining financial aid eligibility in accordance with 34 CFR 668.51-61.

III. Purpose

The purpose of this policy is to establish roles and responsibilities, internal controls, procedures, and deadlines for verifying the accuracy and completeness of information which is used to determine eligibility for Title IV Financial Aid funds. SOMI is required to verify information, as well as identify and resolve conflicting data, contained in the Free Application for Federal Student Aid (FAFSA) to ensure compliance with Title IV Regulations and continued access to Title IV Financial Aid funds.

IV. Scope

This is an institutional policy that applies to all students who submitted the FAFSA containing the SOMI school code.

V. Policy Details

Students may be selected for Verification by the FAFSA Processing System (FPS) or SOMI. Regardless of selection method, students must adhere to the procedures and deadlines set forth in this policy.

Applicants Selected by FPS for Verification

When an application is selected by FPS for Verification, the FAFSA Student Summary (FSS) and Institutional Student Information Record (ISIR) will indicate such a selection and provide the Verification Group. SOMI is responsible for verifying all required elements published annually in the Federal Register.

Applicants Selected by SOMI for Verification

In addition to FPS, the SOMI Financial Aid Office has the right to select an application for Verification. Reasons for selection may include, but are not limited to, random selection, conflicting information or due to concern that data may not be accurate and/or compete. SOMI is required to resolve conflicting information regardless of whether the applicant was selected by FPS for Verification. In addition, all comment codes (C-Codes) indicated on the ISIR are required to be reviewed and resolved by the Financial Aid Office in advance of awarding Title IV Financial Aid.

A. Notification

Students selected for Verification will be notified of such by (1) Verification indicator contained in the FSS and/or (2) electronically via the Student Information System (SIS) in accordance with ADM 1.12 Student Communication policy by the Financial Aid Office. The Financial Aid Office communication will include a list of the document(s) required to be submitted, student responsibilities for correction of information, method for submitting documents, time frame for submitting documents and consequences for failure to adhere to deadlines within the established time frame.

B. Time Frame

Students are required to submit Verification documents to the Financial Aid Office within thirty (30) calendar days of notification. Additionally, students are required to provide Verification documentation prior to the last day of the current Payment Period for Subsidized Federal Financial Aid programs and prior to the annual deadline published in the Federal Register or one hundred and twenty (120) calendar days after the last day in the current Payment Period. The Verification process is complete when SOMI has received, reviewed, and verified all required documentation and SOMI has received a valid ISIR.

C. Failure to Meet Verification Requirements

Failure to submit documentation within the required time frame will result in loss of Title IV Financial Aid eligibility. In such an event, the student is responsible for any financial obligations in accordance with ADM 4.04 Student Accounts policy. Late submissions of Verification documents may be evaluated to determine if Title IV Financial Aid eligibility remains.

D. Corrections and Changes due to Verification

Students are prohibited from updating FAFSA information that was correct as of the date of submission. In the event that FAFSA information does need to be corrected, any change to non-dollar items and dollar items of \$25 or more are required to be submitted. When this occurs, SOMI will receive a subsequent ISIR. Any time SOMI receives a subsequent ISIR, in which a student's SAI has changed, Financial Aid Office will recalculate Title IV Financial Aid eligibility and/or amount of Title IV Financial Aid awards based on the revised SAI. In the event that the amount of Title IV Financial Aid changes, the student will be notified of such electronically via the SIS.

E. Conflicting Data

SOMI is required to identify and resolve any discrepancies in information that it receives from various sources with respect to a student's application for Title IV Financial Aid. In the event that the Financial Aid Office identifies, or has reason to believe that conflicting data exists, the student will receive communication as described in Section A of this policy. The Financial Aid Office is required to investigate and resolve all conflicting data prior to awarding and/or disbursing Title IV Financial Aid funds. The Financial Aid Office routinely validates that information used to determine Title IV Financial Aid is complete and accurate. This includes, but is not limited to, SAI, C-Codes (or Flags), tax return(s), high school diploma or previous baccalaureate degree, changes in enrollment, etc.

F. Referrals

If it is determined that a student has received Title IV Financial Aid funds which they were not eligible to receive, the student is required to repay that amount. If repayment is not made, the overpayment must be referred to the U.S. Department of Education (ED).

SOMI is required to refer students (and parents) to the Office of Inspector General (OIG) when any credible information indicating that an applicant for Title IV Financial Aid may have engaged in fraud or other criminal misconduct in connection with a FAFSA application. Common misconduct includes, but is not limited to, false claims of independent status, false claims of citizenship, false claims of marital status, use of false identities, forgery of signatures of certifications, and false statements of income. Note that fraud is the intent to deceive, as opposed to a mistake on an application.

VI. Definitions**Cost of Attendance (COA)**

Is the anticipated cost that a student may incur during an academic year to attend college. COA typically includes costs for Tuition and Fees, books, course materials, supplies & equipment, living expenses, transportation, personal and professional credential (i.e., AART) expenses. COA does not reflect the actual charges that a student will incur. COA is published annually in the SOMI School Catalog and on the website.

FAFSA Processing System (FPS)

Is the U.S. Department of Education's (ED) application data processing center. FPS processes information from the Free Application for Federal Student Aid (FAFSA) and produces two (2) reports: FAFSA Submission Summary (FSS) which is distributed to students and Institutional Student Information Record (ISIR) distributed to institutions (SOMI).

FAFSA Submission Summary (FSS)

This is a summary of information from the student's FAFSA submission. The student receives a FSS, and the institution (SOMI) receives an Institutional Student Information Record (ISIR). FSSs and ISIRs contain the same information in different formats.

Federal Pell Grant

It is a federal grant that provides Need-based funds to low-income undergraduate and certain post-baccalaureate students to promote access to post-secondary education. Students may qualify for a Federal Pell Grant in one (1) of three (3) ways 1. Maximum Pell Grant (Max Pell), 2. Minimum Pell Grant (Min Pell), or 3. Calculated Federal Pell Grant. Federal Pell Grant award amounts are dependent on the student's SAI, COA, Enrollment Intensity and whether the student attends a full Academic Year or less. Year-Round-Pell is offered to students who meet certain eligibility requirements.

Federal Register

Is the Daily Journal of the United States Government. It contains notices, proposed and final regulations, and presidential documents. Regulations first appear in the Federal Register and when final, are incorporated in the Code of Federal Regulations.

Financial Aid

Is any source of financial funding to defer a student's Cost of Attendance (COA). Examples of Financial Aid may include, but are not limited to, Title IV Financial Aid - Federal Pell Grant and Federal Direct Loans (Subsidized, Unsubsidized and Parent PLUS), Scholarships, Third-Party Payors, etc.

Financial Aid Office

Collectively refers to the Director of Financial Aid, Associate Director of Financial Aid, and Financial Aid Specialists, who are responsible for the timely and accurate awarding, scheduling, and reconciliation of Financial Aid.

Free Application for Federal Student Aid (FAFSA)

It is an application completed by students (and parents) to apply for federal student aid.

Institutional Student Information Record (ISIR)

This is a summary of information from the student's FAFSA submission. ISIRs and FSSs contain the same information in different formats.

Payment Period

Or Semester, is the standard measurement of time in higher education used to group weeks of instructional time in the academic year. A Semester is generally referred to as a period of enrollment and includes fall, spring, and summer.

Student Aid Index (SAI)

Is an eligibility index number that is used to determine the financial resources available to contribute to a student's post-secondary education expense. SAI is calculated by the U.S. Department of Education (ED) FAFSA Processing System (FPS) based on formulas that are established by law. SAI is calculated from information submitted in the Free Application for Federal Student Aid (FAFSA), and federal tax information (FTI) that is

retrieved directly from the Internal Revenue Service (IRS). SAI is reported to the student on the FAFSA Submission Summary (FSS) and to SOMI via the Institutional Student Information Record (ISIR). SOMI uses the SAI, among other information, to determine Financial Aid eligibility and the amount for such award(s). SAI is not the amount of money that a student (or family) will, or is expected to, pay, nor is it the amount of Financial Aid that a student will receive. SAI replaced Expected Family Contribution (EFC). Unlike EFC, SAI may be a negative number, as low as (\$1,500).

Subsidized Federal Financial Aid Programs

Are Title IV Financial Aid programs for which eligibility is determined on the basis of an applicant's SAI. These programs include the Federal Pell Grant and Federal Direct Subsidized Loan programs.

Title IV Financial Aid

Is federal Financial Aid authorized by Title IV of the Higher Education Act of 1965, as amended. Title IV Financial Aid programs that SOMI participates in includes Federal Pell Grant, and Federal Direct Loans (Subsidized, Unsubsidized and Parent PLUS).

Verification

Is the process by which an applicant's FAFSA information is selected by FPS or SOMI to be verified as accurate (true and complete within certain parameters) or inaccurate.

VII. Attachments

N/A

VIII. Related Policies and Procedures

ADM 1.12 Student Communication
ADM 4.01 Federal Financial Aid Administration
ADM 4.04 Student Accounts

IX. Regulatory Notices

Nothing in this policy creates a contractual relationship between Bon Secours St. Mary's Hospital School of Medical Imaging (SOMI), a department operated and controlled by Bon Secours St. Mary's Hospital of Richmond, LLC, and any party. SOMI, in its sole discretion, reserves the right to amend, terminate or discontinue this policy at any time, with or without advance notice.

X. Version Control

Version	Effective Date	Next Review Date	Description	Supersedes, if applicable	Prepared By
1.0	8/1/2022	N/A	Establish AAS Policy	N/A	CFO

2.0	8/1/2023	N/A	Update Definitions COA and policy number updates	1.0	CFO
3.0	8/1/2024	N/A	Revisions and updates to definitions and processes related to the FAFSA Simplification and/or FUTURES Acts, as amended	2.0	CFO
4.0	5/19/2025	5/19/2026	Removed Academic Year 2024-25 references and revised terminology to properly reflect changes made in prior year in relation to the FAFSA Simplification and/or FUTURE Acts, as amended.	3.0	CFO
5.0	8/01/2026	5/01/2027	FAO revision and minor language edits.	4.0	CFO
1	8/1/2026	5/1/2027	Version Changed – BSMH Template Adopted	4.0	CFO

This policy/procedure/guideline is not intended to establish a standard of clinical or non-clinical care or practice. Rather, this policy/procedure/guideline creates a general tool to help guide decision-making with the understanding that different action(s) may be necessary in response to the totality of the circumstances presented.

Sites revised 05/06/2025- Bon Secours Mercy Health adopts the above policy, procedure, policy & procedure, guideline, manual / reference guide / instructions, or principle / standard / guidance document for all Bon Secours Mercy Health entities including, but not limited to, facilities doing business as Mercy Health – St. Vincent Medical Center, St. Vincent – St. Charles Hospital, St. Vincent – St. Anne Hospital,

Mercy Health – Perrysburg Medical Center, Mercy Health – Tiffin Hospital, Mercy Health – Willard Hospital, Mercy Health – Defiance Hospital, Mercy Health Allen Hospital LLC, Mercy Health - Lorain Hospital, Mercy Health St. Elizabeth Youngstown Hospital, Mercy Health St. Joseph Warren Hospital, Mercy Health - St. Elizabeth Boardman Hospital, Mercy Health - St. Rita's Medical Center, Mercy Health – Springfield Regional Medical Center, Mercy Health - Urbana Hospital, Mercy Health - Anderson Hospital, Mercy Health - Clermont Hospital, Mercy Health – Fairfield Hospital, Mercy Health - West Hospital, The Jewish Hospital – Mercy Health, Mercy Health – Kings Mills Hospital, LLC, Mercy Health - Lourdes Hospital LLC, Mercy Health – Marcum and Wallace Hospital, Chesapeake Hospital Corporation DBA Rappahannock General, Maryview Hospital, Bon Secours Richmond Community, Bon Secours Memorial Regional Medical Center, Bon Secours – St. Mary's Hospital, Bon Secours St. Francis Health System, Bon Secours St. Francis Medical Center, Bon Secours Mary Immaculate Hospital, Bon Secours - Southside Medical Center, Bon Secours Mercy Health Franklin, LLC, Southern Virginia Medical Center, and Bon Secours Harbour View Medical Center. This also may apply to Bon Secours Mercy Health Medical Group LLC and its medical group affiliates.